

**Exhibit C**  
**Order to**  
**Show Cause**

At IAS Part \_\_\_\_ of the Supreme Court  
of the State of New York, held in and  
for the County of New York, at the  
Courthouse, 60 Centre Street, New  
York, New York, on the \_\_\_\_ day of  
\_\_\_\_, 2023.

PRESENT: \_\_\_\_\_  
J.S.C.

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

CARLYLE AVIATION MANAGEMENT LIMITED,  
ACCIPITER INVESTMENTS AIRCRAFT 4 LIMITED,  
VERMILLION AVIATION (TWO) LIMITED,  
ACCIPITER HOLDINGS DAC, MAVERICK  
AVIATION HOLDINGS LTD., MANCHESTER  
AVIATION FINANCE S.à r.l., WELLS FARGO  
TRUST COMPANY, N.A., not in its individual capacity  
but solely in its capacity as OWNER TRUSTEE, UMB  
BANK, N.A., not in its individual capacity but solely in  
its capacity as OWNER TRUSTEE,

Plaintiffs,

v.

FRONTIER AIRLINES, INC.,

Defendant.

Index No.: 652599/2023

**[PROPOSED] ORDER TO  
SHOW CAUSE**

MS 001

SUPREME COURT  
STATE OF NEW YORK  
APPROVED

COMMERCIAL DIVISION  
SUPPORT OFFICE

☒ MOTION  
☐ X-MOTION

REST 5/31/2023

CLERK'S INITIALS

Upon reading and filing the accompanying Memorandum of Law dated May 26, 2023;  
the Affirmation of Jed M. Schwartz in Support of the Order to Show Cause dated May 26, 2023  
("Schwartz Affirmation"); and upon all the pleadings and proceedings herein,

LET Defendant Frontier Airlines, Inc. show cause before Commercial Division Part \_\_\_\_  
of this Court by Microsoft Teams on the \_\_\_\_ day of \_\_\_\_, 2023 at \_\_\_\_ o'clock \_\_.m., or as soon  
thereafter as counsel may be heard, why an Order should not be entered pursuant to section 216.1

of the Uniform Rules for Trial Courts, 22 NYCRR § 216.1 sealing the unredacted version of the Complaint in this action, and for such other and further relief as the Court deems just and proper.

*being alleged*  
**SUFFICIENT CAUSE ~~APPEARING~~ THEREFORE, it is hereby**

*AA*  
**ORDERED** that pending the hearing of this Order to Show Cause, the following documents shall be restricted to all except the parties, their counsel and court personnel: the unredacted version of the Complaint; and it is further

*AA*  
**ORDERED** that the Plaintiffs are permitted to file an unredacted version of the Complaint under seal; and it is further

*AA*  
**ORDERED** that the Plaintiffs are permitted to file a redacted version of the Complaint, as annexed to the Schwartz Affirmation as **Exhibit A**, on the public docket via NYSCEF; and it is further

**ORDERED** that Defendant shall file its opposition papers, if any, by \_\_\_\_\_, 2023; and it is further

**ORDERED** that Plaintiffs shall file their reply papers, if any, by \_\_\_\_\_, 2023; and it is further

**ORDERED** that service of a copy of this Order to Show Cause, together with the papers upon which it is granted, shall be made on Defendant via personal service on Defendant's registered agent on or before the \_\_\_\_ day of \_\_\_\_\_, 2023, and that such service shall be deemed good and sufficient service thereof.

ENTER:

*[Signature]*  
J.S.C. HON. JOHN J. KELLEY  
J.S.C.

\_\_\_\_\_  
J.S.C.